

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE: 0:25-cv-60913

ROBERT GILL,

Plaintiff,

v.

CITY OF MARGATE, FLORIDA,
and KYLE WOOLLEY,

Defendants,

_____/

NOTICE OF REMOVAL

Defendants, CITY OF MARGATE, FLORIDA, and KYLE WOOLLEY, by and through undersigned counsel, remove this action from the Seventeenth Judicial Circuit in and for Broward County, Florida, to the United States District Court for the Southern District of Florida and state:

1. Plaintiff has sued Defendants under 42 U.S.C. § 1983.
2. The first pleading giving rise to a right to remove the action was Plaintiff's Complaint filed on April 1, 2025.
3. The Complaint was served on Defendants on April 23, 2025.
4. Pursuant to 28 U.S.C. § 1331 and 1343(a)(3), this Court has original jurisdiction over this action, as this action presents a "federal question" and seeks to redress alleged violations of the Fourth Amendment. See Complaint, Counts I and II.
5. Pursuant to 28 U.S.C. §1441, this action is properly removable to this Court, as this matter is within the original jurisdiction of all civil actions

arising under the Constitution, laws, or treaties of the United States.

6. Pursuant to 28 U.S.C. § 1367(a), this Court may exercise supplemental jurisdiction over Plaintiff's claims asserted in Counts III and IV against the City under Florida law because those claims are closely related to the claim asserted in Counts I and II against Defendants, over which this Court has original jurisdiction, and because all of Plaintiff's claims and counts form the same case and all involve the same alleged events, transactions, occurrences, and controversies.

7. Thirty days have not yet expired since the action which forms the subject matter hereof became removable to this Court.

8. A copy of the operative complaint is attached as **Exhibit "1"** and the other pleadings filed in the state court action are attached hereto as composite **Exhibit "2."**

9. A copy of this Notice will be filed with the Clerk of the Circuit of the Seventeenth Judicial Circuit, in and for Broward County, Florida, as required by 28 U.S.C. §1446(d).

10. Venue is proper in this Court because the alleged conduct occurred within the Southern District of Florida.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of May 2025, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system or by email to all parties. I further certify that I either mailed the foregoing document and the Notice of Electronic Filing by first class mail to any non CM/ECF participants and/or the foregoing document was served via transmission of Notice of Electronic Filing generated by CM/ECF to any and all active CM/ECF participants.

BY: /s/Christopher J. Stearns
CHRISTOPHER J. STEARNS
FLA. BAR NO. 557870
/s/Jonathan H. Railey
JONATHAN H. RAILEY
FLA. BAR NO. 111717
JOHNSON, ANSELMO, MURDOCH,
BURKE, PIPER & HOCHMAN, P.A.
Attorneys for Defendants
2455 East Sunrise Boulevard
Suite 1000
Fort Lauderdale, FL 33304
954/463-0100 Telephone
954/463-2444 Facsimile

Primary service email: stearns@jambg.com
Secondary service email: railey@jambg.com
young@jambg.com
cisaac@jambg.com
nunez@jambg.com

SERVICE LIST

ADAM BALKAN, ESQ.

BALKAN, PATTERSON,
CHARBONET PA

Counsel for Plaintiff

1877 S Federal Highway, Suite 100
Boca Raton, FL 33432

adam@balkanpatterson.com

tiffany@balkanpatterson.com

efile@balkanpatterson.com

CHRISTOPHER J. STEARNS, ESQ.

JONATHAN H. RAILEY, ESQ.

JOHNSON, ANSELMO, MURDOCH,
BURKE, PIPER & HOCHMAN, PA

Attorneys for Defendants

2455 E. Sunrise Blvd., Suite 1000
Fort Lauderdale, FL 33304
(954) 463-0100 (Phone)

stearns@jambg.com

young@jambg.com

railey@jambg.com

cisaac@jambg.com

nunez@jambg.com